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Attorney for: Bank of America, N.A., successor by merger to BAC Home Loans Servicing, LP
fka Countrywide Home Loans Servicing LP, its assignees and/or successors

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re) Case No. 11-25836-bam
)
)
Suratvadee ROUNGPET,) Chapter 13
)
Debtor.)
) **OBJECTION TO CONFIRMATION OF**
) **CHAPTER 13 PLAN**
)
) **341(a) Meeting of Creditors:**
) Date: 12/6/2011
) Time: 9:00 AM
) Place: 341s - Foley Bldg., Room 1500
) Las Vegas NV
)
) **Confirmation Hearing:**
) Date: 12/15/2011
) Time: 1:30 PM
) Ctrm: 3, 3rd Floor
) Place: Foley Federal Building, United States
) Courthouse
) Las Vegas NV
)
) Judge: Bruce A. Markell
)

Bank of America, N.A., successor by merger to BAC Home Loans Servicing, LP fka
Countrywide Home Loans Servicing LP, its assignees and/or successors, ("Bank of America") in
the above-entitled Bankruptcy proceeding, hereby submits the following Objections to
Confirmation of the Chapter 13 Plan proposed by ("Debtor") Suratvadee ROUNGPET.

1 WHEREFORE, Bank of America prays as follows:

2 1. That confirmation of the Proposed Chapter 13 Plan be denied, or in the
3 alternative, be amended to provide for full payoff of the arrearages owed to Bank of America
4 within 60 months;

5 2. That confirmation be denied because the Property is not eligible for cramdown as
6 a principal residence;

7 3. That no Plan be confirmed without an Order valuing the Property following a
8 separate motion;

9 4. For attorneys' fees and costs herein,

10 5. For such other relief as this Court deems proper.

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12 Respectfully submitted,

13 McCarthy & Holthus, LLP

14 12/1/2011

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16 By: /s/ Christopher K. Lezak, Esq.
17 Christopher K. Lezak, Esq.
18 Attorney for Bank of America, N.A.,
19 successor by merger to BAC Home
20 Loans Servicing, LP fka Countrywide
21 Home Loans Servicing LP
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